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Attorneys for Plaintiff Gor Gevorkyan

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

Gor Gevorkyan on behalf of himself and all  
others similarly situated,

Plaintiff,

vs.

Bitmain, Inc., Bitmain Technologies, Ltd.  
and DOES 1 to 10,

Defendants.

**THE MARLBOROUGH LAW FIRM, P.C.**

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Case Number: 3:18-cv-07004-JD

**JOINT STIPULATION AND  
[PROPOSED] ORDER EXTENDING  
TIME TO CONDUCT  
JURISDICTIONAL DISCOVERY AND  
CONTINUING JURISDICTIONAL  
BRIEFING SCHEDULE**

Complaint Filed: November 19, 2018  
Trial Date: None Set

1 Plaintiff Gor Gevorkian (“Plaintiff”) and Defendant Bitmain Technologies, Ltd.  
2 (“Defendant”) (together with Plaintiff, the “Parties”), hereby stipulate and agree as follows:

3 **WHEREAS**, on December 19, 2019, the Court granted leave for Plaintiff to conduct  
4 jurisdictional discovery on Defendant for a period of 120 days (ECF No. 44);

5 **WHEREAS**, on April 15, 2020, the Parties stipulated to allow Plaintiff additional time  
6 to conduct jurisdictional discovery, including the taking of Luyao Liu’s deposition, in light of  
7 the COVID 19 pandemic (ECF No. 51);

8 **WHEREAS**, on November 24, 2020, the Court issued an order extending the  
9 jurisdictional discovery deadline to January 8, 2021, to allow Defendant to produce additional  
10 documents, and to allow Plaintiff to take a written deposition of Luyao Liu (ECF No. 71);

11 **WHEREAS**, on November 24, 2020, the Court also instructed the Parties to file  
12 simultaneous briefs on February 7, 2021 regarding the issue of jurisdiction over the Defendant  
13 (ECF No. 71);

14 **WHEREAS**, the Parties are informed that Luyao Liu is no longer employed by  
15 Defendant, and thus, can no longer be produced by Defendant for a deposition;

16 **WHEREAS**, any substitute deponent whom Defendant might produce would be located  
17 in mainland China;

18 **WHEREAS**, the Parties are informed that a deposition of any kind of a resident of  
19 mainland China cannot be taken, whether written or oral, and that as a result of tightened travel  
20 restrictions currently in place in response to a new strain of COVID-19 that is even more  
21 contagious, requiring a witness to travel outside of mainland China for a deposition would be  
22 unduly burdensome and unreasonable due to current travel restrictions resulting from the  
23 COVID-19 pandemic;

24 **WHEREAS**, the deposition of Defendant’s witness(es) cannot be taken until the travel  
25 restrictions currently being imposed in response to the COVID-19 pandemic are lifted; and,  
26  
27  
28

1           **WHEREAS**, the Parties believe that the relevant travel restrictions will likely be in  
2 place for at least another 6 months.

3           **THEREFORE, THE PARTIES HAVE MET AND CONFERRED AND AGREED**  
4 **THAT:**

- 5           1. The time for Plaintiff to depose a Bitmain witness should be extended until the  
6 relevant travel restrictions are lifted such that Plaintiff is able to take the  
7 aforementioned deposition;  
8           2. Once the relevant travel restrictions are lifted, Defendant will produce a witness who  
9 is knowledgeable regarding the facts set forth in the Declaration of Luyao Liu for a  
10 deposition;  
11           3. The Parties will work cooperatively to monitor the travel restrictions and conduct  
12 the aforementioned deposition as soon as possible once travel restrictions permit the  
13 deposition of a mainland Chinese resident without unreasonable burden;  
14           4. Plaintiff's period in which to conduct jurisdictional discovery is otherwise closed,  
15 except that Plaintiff shall be permitted to file a motion to compel further document  
16 production related to the Court's November 24, 2020 order by no later than  
17 February 15, 2021;  
18           5. Defendant, by agreeing to this stipulation, does not concede that any motion to  
19 compel contemplated to be filed by Plaintiff has merit or that Defendant has not  
20 already made a complete production in full compliance with the Court's November  
21 24, 2020 order; and  
22           6. The current deadline to file simultaneous briefs addressing the issue of specific  
23 jurisdiction over the Defendant should be vacated, and should be reset for 30 days  
24 after the date that Plaintiff takes the aforementioned deposition.  
25

26           **NOW, THEREFORE**, the undersigned Parties hereby stipulate and agree, subject to  
27 Court approval, that:  
28

1. The time for Plaintiff to depose a Bitmain witness should be extended until the relevant travel restrictions are lifted such that Plaintiff may take the aforementioned deposition;
2. Plaintiff shall have until July 22, 2021 to take the aforementioned deposition; however, if the relevant travel restrictions have not been lifted by this date, Plaintiff may seek additional leave of Court to further extend the deadline to conduct the deposition;
3. Plaintiff shall have until February 15, 2021 to file a motion to compel further document production related to the Court's November 24, 2020 order;
4. The period in which Plaintiff may take jurisdictional discovery is otherwise closed; and
5. The current briefing schedule is VACATED, and the Parties shall file simultaneous briefs addressing the issue of specific jurisdiction over the Defendant within 30 days after the date that Plaintiff takes the aforementioned deposition(s).

**IT IS SO STIPULATED**

Dated: January 25, 2021

/s/ Karo G. Karapetyan  
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Attorneys for Plaintiff

Dated: January 25, 2021

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Attorneys for Defendant  
Bitmain Technologies, Ltd.

### ECF CERTIFICATION

Pursuant to Civil Local Rule 5-1, I, Karo G. Karapetyan, hereby attest that concurrence in the filing of this document has been obtained from all signatories.

DATED: January 25, 2021

FRONTIER LAW CENTER

By: /s/ Karo G. Karapetyan  
Karo G. Karapetyan

**[PROPOSED] ORDER**

The Court, having considered the Joint Stipulation submitted by the Parties, and good cause appearing, orders as follows:

1. The time for Plaintiff to depose a Bitmain witness is extended until the relevant travel restrictions are lifted such that Plaintiff may take the aforementioned deposition;
2. Plaintiff shall have until July 22, 2021 to take the aforementioned deposition; however, if the relevant travel restrictions have not been lifted by this date, Plaintiff may seek additional leave of Court to further extend the deadline to conduct the deposition;
3. Plaintiff shall have until February 15, 2021 to file a motion to compel further document production related to the Court's November 24, 2020 order;
4. The period in which Plaintiff may take jurisdictional discovery is otherwise closed; and
5. The current briefing schedule is VACATED, and the Parties shall file simultaneous briefs addressing the issue of specific jurisdiction over the Defendant within 30 days after the date that Plaintiff takes the aforementioned deposition(s).

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
Hon. James Donato  
UNITED STATES DISTRICT JUDGE